

Karl Kronenberger (CA Bar No. 226112)  
 karl@krinternetlaw.com  
 Jeffrey M. Rosenfeld (CA Bar No. 222187)  
 jeff@krinternetlaw.com  
 Kronenberger Rosenfeld, LLP  
 150 Post Street, Suite 520  
 San Francisco, CA 94108  
 415-955-1155 Telephone

Rudolph A. Telscher, Jr. (*pro hac vice*)  
 rudy.telscher@huschblackwell.com  
 Kara R. Fussner (*pro hac vice*)  
 kara.fussner@huschblackwell.com  
 HUSCH BLACKWELL LLP  
 190 Carondelet Plaza, Suite 600  
 St. Louis, MO 63105  
 314-480-1500 Telephone

Ryan B. Hauer (*pro hac vice*)  
 Ryan.hauer@huschblackwell.com  
 HUSCH BLACKWELL LLP  
 120 South Riverside Plaza Suite 2200  
 Chicago, IL 60606  
 312-526-1572 Telephone

*Attorneys for Defendants/Counterclaim  
 Plaintiffs BrandTotal, Ltd. and Unimania,  
 Inc.*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

FACEBOOK, INC., a Delaware corporation,  <div style="text-align: right;">Plaintiff/Counterclaim Defendant,</div>	v.	BRANDTOTAL LTD., an Israel corporation, and UNIMANIA, INC., a Delaware corporation,  <div style="text-align: right;">Defendants/ Counterclaim Plaintiffs.</div>
--	----	--

Case No. 3:20-CV-07182-JCS

**DECLARATION OF RUDOLPH A.  
 TELSCHER, JR. IN SUPPORT OF  
 STIPULATION TO ENLARGE TIME  
 TO RESPOND TO FACEBOOK,  
 INC.'S MOTION TO DISMISS PER  
 L.R. 6-2**

1 I, Rudolph A. Telscher, Jr., hereby state and declare as follows:

2 1. I am a member of the bar of the State of Missouri. I am a lawyer at the law firm of  
3 Husch Blackwell LLP, attorneys for Defendants/Counterclaim Plaintiffs BrandTotal, Ltd. and  
4 Unimania, Inc. in the above-captioned action. I am over the age of eighteen and competent to make  
5 this declaration. My testimony in this declaration is based on personal knowledge and, if called as a  
6 witness, could competently testify to the facts below.

7 2. Facebook had previously requested, and BrandTotal had agreed to, an extension of  
8 time for Facebook to respond to BrandTotal's counterclaims up to and including November 23,  
9 2020.

10 3. On that date Facebook filed its Motion to Dismiss, Dkt 77.

11 4. The parties did not discuss, prior to filing, any schedule relating to the motion.

12 5. The parties have since discussed the schedule, and agreed that the deadline for  
13 BrandTotal to respond to the Motion to Dismiss shall be enlarged up to and including January 6,  
14 2020, that the deadline for Facebook to file its reply in support of the Motion to Dismiss shall be  
15 enlarged up to and including February 3, 2020, and that the hearing date for the Motion to Dismiss  
16 be reset by the Court.

17 6. BrandTotal requests that the Court allow this enlargement due to the holidays and the  
18 fact that the parties are engaged in discovery relevant to the preliminary injunction motion, and also  
19 because counsel has several other pressing matters.

20 7. There have been no prior time modifications to this briefing schedule.

21 8. This request will have no effect on the remainder of the schedule for this case.

22 \*\*\*

23 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the above statements are  
24 true and correct.

25 EXECUTED this 3<sup>rd</sup> day of December, 2020, in St. Louis, Missouri.

26  
27 /s/ Rudolph A. Telscher, Jr.  
28